

July 25, 2022

VIA ECF

The Honorable Sarah L. Cave
United States District Court for the Southern District of New York
500 Pearl St.
New York, NY 10007

Catherine McKoy, et al. v. Trump Corp., et al., 1:18-cv-9936 (LGS-SLC)

Dear Judge Cave:

The parties submit this joint letter pursuant to the Court's July 15, 2022 Order, ECF No. 445, and further to the parties' July 14, 2022 joint update, ECF No. 444, concerning the status of the parties' compliance with the Court's May 18, 2022 Order, ECF No. 424.

First, the parties are pleased to report that they have reached an agreement in principle concerning partial production of exhibits to the Trump University deposition transcripts that addresses Defendants' concerns with respect to the protective order.

Second, the parties have continued to take party and non-party depositions. For reasons largely outside the parties' control, certain deposition dates have been rescheduled, by agreement of the parties. The parties are working diligently and cooperatively to complete all depositions, mindful of the current August 31 deadline. The parties anticipate needing a short extension to complete all party and non-party depositions, and expect to bring that issue to the Court jointly and promptly.

Third, as previously reported, Defendants have designated two individuals to testify on behalf of Defendant The Trump Organization, pursuant to Rule 30(b)(6). The parties are continuing to meet and confer concerning the scope of the Rule 30(b)(6) deposition and will bring any issues to the Court's attention as they arise.

Respectfully submitted,

The parties shall continue to meet and confer and, by **August 8, 2022**, file a further joint letter, not exceeding five pages in length, reporting on the status of discovery and, if necessary, setting forth the basis and terms of the parties' proposed extension of the fact discovery deadline.

SO ORDERED 7/25/2022


SARAH L. CAVE
United States Magistrate Judge